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HAZARDOUS WASTE TECHNICAL ASSISTANCE SURVEY, HEADQUARTERS 132D TACTICAL FIGHTER WING, IOWA AIR NATIONAL GUARD, DES MOINES, IOWA

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OCCUPATIONAL AND ENVIRONMENTAL HEALTH DIRECTORATE
Brooks Air Force Base, TX 78235-5000

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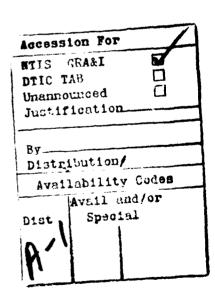
TABLE OF CONTENTS

	Page
ACKNOWLEDGMENTS	. iv
INTRODUCTION	1
BASE DESCRIPTION	. 1
HAZARDOUS WASTE MANAGEMENT PROGRAM	. 1
PROCEDURE	2
OBJECTIVES	. 2
SUMMARY OF WASTE PRACTICES AT 132 TFW, IOWA ANG	2
OBSERVATIONS AND RECOMMENDATIONS	3
Regulatory Deficiencies at Accumulation Point (AP) Formal Designation of AP Manager. Management of Satellite Accumulation Point (SAP). Tracking of Waste Disposal Drums. Waste Management Accountability. Environmental Coordinator Vacancy.	3 4 4 4
BIBLIOGRAPHY	5
APPENDIX A: Request Letter	7
APPENDIX B: Hazardous Waste Technical Assistance Survey Shop Supervisor Interview Form	11
APPENDIX C: Disposal Practices by Shop at 132 TFW, Iowa ANG	15
APPENDIX D: Summary of Waste Disposal Practices for Each Waste Category	19
APPENDIX E: Master List of Shops	23

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The author wishes to thank the personnel at 132 TFW, Iowa Air National Guard, who provided information and logistics support during this survey. 2Lt John Kabitzke, Base Environmental Coordinator, and MSgt Zickel and TSgt Palmer, Base Accumulation Point Managers, provided valuable information on the management of the hazardous waste program. Special thanks are given to TSgt Grove, Base Bioenvironmental Engineering Technician, for his escort support during shop visits and providing his corporate knowledge on the waste accumulation and handling practices on base.





HAZARDOUS WASTE TECHNICAL ASSISTANCE SURVEY, HEADQUARTERS 132D TACTICAL FIGHTER WING, IOWA AIR NATIONAL GUARD, DES MOINES, IOWA

INTRODUCTION

On 5 Oct 90, the 132d Mission Support Squadron of the 132d Tactical Fighter Wing (132 TFW), Iowa Air National Guard (ANG), requested the Air Force Occupational and Environmental Health Laboratory* to conduct a Hazardous Waste Technical Assistance Survey at HQ 132 TFW, Des Moines (Appendix A). The survey results will be used to improve the base hazardous waste management program. The scope of the survey is to address hazardous waste management practices and evaluate opportunities for waste minimization.

The survey was conducted by Capt Patrick T. McMullen and Capt Chung H. Yen during 1-2 May 91.

BASE DESCRIPTION

HQ 132 TFW, Iowa ANG, is located on the northwest acreage of the Des Moines International Airport (IAP). HQ 132 TFW is responsible for the maintenance and the flying operation of an A-7D/K squadron. Currently, there are no tenant units physically residing on Iowa ANG basehold at Des Moines IAP.

HAZARDOUS WASTE MANAGEMENT PROGRAM

The hazardous waste management program at HQ 132 TFW, Des Moines IAP, is managed primarily by the Environmental and Contracting Planning Office in Civil Engineering (132 TFW/DEV). Bioenvironmental Engineering Services (BES) helps monitor the program through industrial shop surveys and is responsible for waste sampling at the request of 132 TFW/DEV.

Individual shops are responsible for identifying, segregating, handling, packaging, and labelling the wastes generated by their shop. The wastes are collected at satellite accumulation points (SAP) within the shop vicinity. These wastes are ultimately placed in 55-gallon drums located at an accumulation point (AP) on base.

^{*}The Air Force Occupational and Environmental Health Laboratory has been redesignated Armstrong Laboratory, Occupational and Environmental Health Directorate.

When wastes require disposal, the shop initiates a DD Form 1348-1 for waste turn-in. This is then given to a 132 TFW/DEV representative who processes the form for eventual disposal of wastes via the Defense Reutilization and Marketing Office (DRMO) at Offutt Air Force Base (AFB).

PROCEDURE

The first step of the survey was to review the base hazardous waste management plan and identify shops that are potential generators of hazardous waste streams. Next, 12 industrial shops were visited to observe industrial operations, discuss chemical waste disposal practices with shop supervisors and personnel, and complete interview forms (Appendix B).

The base AP and all SAPs were visited and assessed.

The overall hazardous waste management program was discussed with the following individuals:

2Lt John Kabitzke	Base Environmental Coordinator
MSgt Zickel	Base Accumulation Point Manager
TSgt Palmer	Base Accumulation Point Manager
TSgt Tim Grove	Base Bioenvironmental Engineering Technician

OBJECTIVES

Evaluate management of hazardous waste program.

Identify opportunities for waste minimization.

SUMMARY OF WASTE DISPOSAL PRACTICES AT 132 TFW, IOWA ANG

The waste disposal practices for different categories of wastes are summarized in this section. A shop-by-shop summary of disposal practices is contained in Appendix C.

Waste oils and fluids are accumulated in 55-gallon drums at or near points of generation. Once full, the drums are transported to the AP. These waste are stored until transport for disposal by DRMO at Offutt AFB.

Waste paint, thinners, and strippers are placed in 55-gallon drums, transported to the AP, and stored until disposal by Offutt DRMO.

Soap solutions are rinsed down the drain into the sanitary sewer. In most instances, they run straight into the vicinity creeks at the airport.

Waste penetrants, emulsifiers, developer, and magnetic particle oils from the Nondestructive Inspection (NDI) shop are drummed and disposed of by Offutt DRMO.

Waste fuels consisting of JP-4, mogas, and diesel are accumulated in 55-gallon drums at or near the shop areas. Once full, the drums are transported to the AP. Most fuels are disposed of through Offutt DRMO. However, 132 TFW Fuel Cell Repair recycles 120 gallons of residual JP-4 fuel each year.

Spent and waste batteries are turned in to Offutt DRMO for disposal.

A summary of waste disposal practices for each waste category is shown in Appendix D.

Appendix E is a master list of shops.

OBSERVATIONS AND RECOMMENDATIONS

Regulatory Deficiencies at Accumulation Point (AP)

The hazardous waste AP consists of an uncovered, concrete diked area elevated 18" of sufficient size for base needs. The site is unsecured, open to weather, and without spill response equipment. Moreover, this site does not have an "emergency response coordinator" (with alternate) appointed by the base commander.

REC: To meet safety and emergency response requirements under 40 CFR 262.34 the following is required: posting of emergency response requirements as detailed in 262.34 (d)(5)(ii), formal designation by the base commander of an individual to serve as his "emergency response coordinator," a written program for emergency response at the site, and proper training for all employees who have access to this area.

Though not required by law, for a small quantity generator, it is advantageous for the base to upgrade the AP with a cover and security fencing. The storage drums at the SAP should be secured with locking devices. These measures will help minimize the occurrence of inadvertent and unauthorized mixing of hazardous waste with used oil and spent fuel.

Formal Designation of AP Manager

There is an AP manager who currently assumes operational responsibilities. However, an individual has not been officially appointed by the base commander.

REC: The base commander should assign the present AP manager (with alternate) in writing.

Management of Satellite Accumulation Point (SAP)

The base has several SAPs located near the generation points. There was not a clear understanding as to the identity of the SAP managers. At the time of this visit, there were several drums unsecured. As the drums were not covered, they are exposed to the rain and snow. This exposure could lead to corrosion of the drums and leaking of their contents.

REC: The base commander should assign a SAP manager (and alternate) in writing for each point. The responsibilities for this position are outlined in the base's Hazardous Waste Management Plan. Although not required by law, all drums in the SAP should be secured with a lock assembly. When transferred to the AP, locks and responsibilities will be transferred from the SAP manager to the AP manager. All drums must be protected with a polyethylene drum cover while in storage at the SAP. Additionally, the Field Maintenance SAP building should continue to be used for storage.

Tracking of Waste Disposal Drums

The base has a recurring problem of unmarked drums of waste appearing at the AP or base supply. In the absence of any "User's Knowledge" regarding the contents, the base is required to perform a full hazardous waste analysis at approximately \$1,800/drum. IAW 40 CFR 264, the generator of the waste has the total responsibility for storage, labelling, identification, and transportation of the waste to the AP.

REC: A simple solution to this problem has been implemented at several other installations. A system is established to numerically code all drums used in the shops for waste storage (hazardous and nonhazardous). The number must be assigned and centrally recorded before waste is initially added to a drum. The number is then verified, as it is turned in to the AP.

Waste Management Accountability

The base has not effectively implemented the base Hazardous Waste Management Plan to include proper designation of SAP and provisions for training of these individuals.

REC: The base needs to continue to provide training for SAP/AP managers that addresses procedures for storing, handling, and transporting waste on the base. (Note: Hazardous waste manager training was ongoing during this survey and is expected to address this issue.)

Environmental Coordinator Vacancy

The National Guard Bureau has approved and funded a slot for a full-time environmental coordinator. This slot is currently vacant. Most of the above recommendations would fall under the responsibility of this office.

REC: Considering the regulatory breadth and technical complexity of the environmental program requirements of the 132 TFW, we strongly recommend this position be filled with a competent engineering professional.

BIBLIOGRAPHY

- 1. United States Environmental Protection Agency, Samplers and Sampling Procedures for Hazardous Waste Streams, EPA-600/2-60-018, Jan 1980.
- 2. Code of Federal Regulations, Title 29, Labor, Part 1910, Occupational Safety and Health Standards, Section 120, Hazardous Waste Operations and Emergency Response, 1990.
- 3. Code of Federal Regulations, Title 40, Protection of Environment, Part 261, Identification and Listing of Hazardous Waste, Part 262, Standards Applicable to Generators of Hazardous Waste, and Part 264, Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, 1990.

APPENDIX A

Request Letter

IOWA AIR NATIONAL GUARD

HEADQUARTERS, 132ND TACTICAL FIGHTER WING 3100 McKINLEY AVE., DES MOINES, IOWA 50321-2799

Y TO I OF:

132d MSS/CCE

5 October 1990

Ect: Hazardous Waster Minimization Survey

TO: DCS

NGE/SGBY 2 NG 98 AF OEHL/EQH

IN TURN

- The 132d Tactical Fighter Wing is in the process of trying to reduce or minimize the accumulation of hazardous waste which benefits the environment for everyone. This unit is actively involved in pursuing all avenues available to strengthen the program.
- We would appreciate your assistance in performing a hazardous waste minimization technical assistance survey at the earliest possible date. TSgt Tim Grove/SGPB can be contacted at 939-8575, Tuesday through Friday to coordinate the survey and handle your needs.

CARY A. FITZ ALD, Capt, Iowa ANG

Mission Support Officer

1st Ind, 132d TFW/DCS

10 October 1990

TO: 132d TFW/CC

Request forwarded for your approval. This survey will be very beneficial to this unit in identifying and minimizing hazardous waste.

HARRY E. CLARK, Major, Towa ANG Deputy Commander for Support

2nd Ind, 132d TFW/CC

10 October 1990

TO: NGB/SGB

Request is valid and forwarded for your consideration. This survey will greatly benefit this unit.

DONALD W. ARMINCTON, Col, Iowa ANG

Commander

3rd Ind to 132nd MSS/CCE ltr, 5 Oct 90, Hazardous Waste Minimization Survey NGB/SGB 2 Nov 90

TO: AFOEHL/EQH

- 1. This request has been reviewed and discussed with the requesting unit.
- 2. Your support is once again appreciated, NGB/SGB POC is Lt Col Washeleski or CMSgt Craig, DSN 858-8535

JAMES L. CRAIG, JR., CMSgt, USAF Supt, Bioenvironmental Engineering

APPENDIX B

Hazardous Waste Technical Assistance Survey Shop Supervisor Interview Form

HAZARDOUS WASTE TECHNICAL ASSISTANCE SURVEY SHOP SUPERVISOR INTERVIEW FORM

SHOP & OFFICE SYMBOL _		TRAT	EXT	
BUILDING	CON	ITACT		
WORKLOAD				
WASTE STREAM	TYPE/NSN	QTY/MO.	DISPOSAL METHO	<u>D</u>
FUEL				
7808 MOTOR OIL				
SYNTHETIC OIL				
FLUIDS (B,T,OR H)				
SOLVENTS				
WASTE PAINTS (TYPE)				
THINNERS (TYPE)				
STRIPPERS (TYPE)				
SOAPS (dil ratio)				<u>-</u>
BATTERIES				
SPEEDY DRY				
SHOP RAGS				
		*** * * * * * * * * * * * * * * * * *		
O/W SEPARATORS (NO.,US	SE,CLEANOUT FREG	Q & DISPOSAL)		
RECOMMENDATIONS				
	*****		***************************************	

OTHERS							
PENETRANT		EMULSIFIER		ANTIFREE	ZE	CARBON REM	OVER
MAG PARTICLE TANKS		DEVELOPER		O/W SLUD	OGE	ACIDS	
CHEMICAL	S	IZE	CHANGE FRE	ΣQ.	DISPOSAL	MIS.	
							
							···
UST'S							
USE	SIZE	LOC#	ATION	PUMP	OUT FREQ	LEAK	TESTED
				 			
							

APPENDIX C Disposal Practices by Shop at 132 TFW, Iowa ANG

DISPOSAL PRACTICES BY SHOP AT IOWA AIR NATIONAL GUARD

SHOP: 132 TFW Gun Services	Building: 124	
WASTE PRODUCT	QTY (GALYR)	
Carbon Remover Safety Kleen	600 240	DRMO CD
Total:	840	
SHOP: 132 TFW NDI	Building: 230	
WASTE PRODUCT	QTY (GAL/YR)	
Penetrant Emulsifier Developer Magnetic Oil	20 20 50 15	DRMO DRMO DRMO DRMO
Total:	105	
SHOP: 132 TFW Electric/Battery	Building: 100	
WASTE PRODUCT	QTY (BATTERIES/YR)	DISPOSAL
WASTE PRODUCT Ni-Cad Lead ACid	QTY (BATTERIES/YR) 25 30	DRMO DRMO
WASTE PRODUCT Ni-Cad	QTY (BATTERIES/YR) 25 30	DRMO DRMO
WASTE PRODUCT Ni-Cad Lead ACid	QTY (BATTERIES/YR) 25 30	DRMO DRMO
WASTE PRODUCT Ni-Cad Lead ACid Total:	QTY (BATTERIES/YR) 25 30 55	DRMO DRMO
WASTE PRODUCT Ni-Cad Lead ACid Total: SHOP: 132 TFW Pneudraulics	QTY (BATTERIES/YR) 25 30 55 Building: 100	DRMO DRMO

SHOP: 132 TFW Phase Maintenance	Building: 100	
WASTE PRODUCT	QTY (GAL/YR)	DISPOSAL
Oil & Fluid PD—680 Type II	24 360	DRMO DRMO
Total:	384	
SHOP: 132 TFW Repair and Reclamation	Building: 100	
WASTE PRODUCT	QTY (GAL/YR)	DISPOSAL
Stripper SE-377 cleaner PD—680 Type II Safety Kleen	160 60 10 180	DRMO DRMO DRMO CD
Total:	410	
SHOP: 132 TFW AGE	Building: 104	
WASTE PRODUCT	QTY (GAL/YR)	DISPOSAL
	QTY (GAL/YR)	DISPOSAL DRMO DRMO SS CD
WASTE PRODUCT Fuel Oil & Fluid Soaps	QTY (GAL/YR) 12 400 60	DRMO DRMO SS
WASTE PRODUCT Fuel Oil & Fluid Soaps Safety Kleen	QTY (GAL/YR) 12 400 60 160	DRMO DRMO SS
WASTE PRODUCT Fuel Oil & Fluid Soaps Safety Kleen Total:	QTY (GAL/YR) 12 400 60 160	DRMO DRMO SS
WASTE PRODUCT Fuel Oil & Fluid Soaps Safety Kleen Total: SHOP: 132 TFW Structural Repair	QTY (GAL/YR) 12 400 60 160 632 Building: 315	DRMO DRMO SS CD

SHOP: 132 TFW Fuel Cell Repair	Building: 315	
WASTE PRODUCT	QTY (GAL/YR)	DISPOSAL
Fuel	120	REC
Total:	120	
SHOP: 132 TFW A-7 Propulsion	Building: 160	
WASTE PRODUCT	QTY (GAL/YR)	DISPOSAL
Fuel Oil & Fluid Safety Kleen PD—680 Type II	24 2,400 360 30	DRMO DRMO CD DRMO
Total:	2,814	
SHOP: 132 TFW Fuel Management	Building: 112	
WASTE PRODUCT	QTY (GAL/YR)	DISPOSAL
Fuel Petroleum Ether	150 5	DRMO DRMO
Total:	155	
SHOP: 132 TFW Vehicle Maintenance	Building: 105	
WASTE PRODUCT	QTY (GAL/YR)	DISPOSAL
Oil & Fluid Thinners A/C Soap Batteries Safety Kleen	720 660 360 24 Batteries/YR 120	DRMO DRMO SS DRMO CD
Total:	1,884	

LEGEND: DRMO denotes Defense Reutilization and Marketing Office SS denotes Sanitary Sewer CD denotes Contractor Disposal REC denotes Recycled UIP denotes Used In Process

APPENDIX D

Summary of Waste Disposal Practices for Each Waste Category

SUMMARY OF WASTE DISPOSAL PRACTICES FOR EACH WASTE CATEGORY

WASTE: FUEL

SHOP	WASTE	QTY (GAL/YR)	DISPOSAL
132 TFW AGE	Fuel	12	DRMO
132 TFW Fuel Cell Repair	Fuel	120	REC
132 TFW A-7 Propulsion	Fuel	24	DRMO
132 TFW Fuel Management	Fuel	150	DRMO
Total:		306	

WASTE: OIL & FLUID

SHOP	WASTE	QTY (GAL/YR)	DISPOSAL
132 TFW NDI	Mag Oil	15	DRMO
132 TFW Pneudraulics	Fluid	174	DRMO
132 TFW Phase Maintenance	Oil & Fluid	24	DRMO
132 TFW AGE	Oil & Fluid	400	DRMO
132 TFW A-7 Propulsion	Oil & Fluid	2,400	DRMO
132 TFW Vehicle Maintenance	Oil & Fluid	720	DRMO
Total:		3,733	

WASTE: DEGREASERS/CLEANERS

WASTE	QTY (GAL/YR)	DISPOSAL
PD-680 Type II	36	UIP
	360	DRMO
	10	DRMO
• •	30	DRMO
SE-377 Cleaner	60	DRMO
Safety Kleen	240	CD
Safety Kleen	180	CD
•	180	CD
•	160	CD
•	360	CD
Safety Kleen	120	CD
	PD-680 Type II PD-680 Type II PD-680 Type II PD-680 Type II SE-377 Cleaner Safety Kleen Safety Kleen Safety Kleen Safety Kleen Safety Kleen Safety Kleen	PD-680 Type II 36 PD-680 Type II 360 PD-680 Type II 10 PD-680 Type II 30 SE-377 Cleaner 60 Safety Kleen 240 Safety Kleen 180 Safety Kleen 180 Safety Kleen 160 Safety Kleen 360

Total: 1,736

WASTE: BATTERIES

132 TFW Electric/Battery Ni-Cad Batteries 25 DR 132 TFW Electric/Battery Lead Acid 30 DR Batteries	SPOSAL RMO RMO RMO
132 TFW Electric/Battery Lead Acid 30 DR Batteries 132 TFW Vehicle Maintenance Batteries 24 DR	RMO
132 TFW Vehicle Maintenance Batteries 24 DR	RMO
Total: 79	
WASTE: NDI	
SHOP WASTE QTY (GAL/YR) DIS	SPOSAL
132 TFW NDI Penetrant 20 DR 132 TFW NDI Emulsifier 20 DR 132 TFW NDI Developer 50 DR 132 TFW NDI Mag Oil 15 DR	RMO RMO RMO RMO
Total: 105	10002010000
WASTE: CARBON REMOVER	
SHOP WASTE QTY (GALYR) DIS	SPOSAL
	RMO
Total: 600	144444444
WASTE: PAINT RELATED	
SHOP WASTE QTY (GAL/YR) DIS	SPOSAL
132 TFW Structural Repair Waste Paint 110 DR & Thinner	RMO
132 TFW Vehicle Maintenance Thinner 660 DR	RMO RMO

930

Total:

WASTE: SOAP

SHOP	WASTE	QTY (GALYR)	DISPOSAL
132 TFW AGE 132 TFW Vehicle Maintenance	Soap A/C Soap	60 360	SS S
Total:		420	

LEGEND: DRMO denotes Defense Reutilization and Marketing Office SS denotes Sanitary Sewer CD denotes Contractor Disposal REC denotes Recycled UIP denotes Used In Process

APPENDIX E

Master List of Shops

MASTER LIST OF SHOPS

SHOP	CONTACT	BUILDING	PHONE NUMBER
Gun Services	MSgt Davidson	124	939-8394
NDI	SSgt Easley	230	939-8367
Electric/Battery	MSgt Swenson	100	939-8355
Pneudraulics	SSgt Burney	100	939-8359
Phase Maint.	TSgt Miller	100	939-8380
Repair/Reclamation	TSgt Anderson	100	939-8357
AGE	MSgt VanWaardhuizen	104	939-8362
Structural Repair	TSgt Bosworth	315	939-8366
Fuel Cell Repair	TSgt Pasco	315	939-8363
Propulsion	SMSgt Buzzell	160	939-8368
Fuels Management	SSgt Starmer	112	939-8444
Vehicle Maint	MSgt Metcalf	105	939-8445